



## **PRIVACY NOTICE**

**Effective Date:** May 2018

### **Data Controller**

Small World Financial Services Group Ltd

Small World Group FS (Small World) incorporates, among others, the following European legal entities:

1. LCC Trans-Sending Ltd (including branches incorporated in Ireland, Germany, Netherlands & Italy)
2. LCC Trans-Envio SPRL
3. Small World Financial Services (Canada) Limited
4. Swiss Transfers GmbH
5. Small World FS, Ireland Ltd
6. Small World FS Norway AS
7. Small World FS, Spain SAU
8. Small World FS, Sweden AB
9. Small World Financial Services Spain S.A.
10. Small World Exchange Services, SLU
11. Trans-Envio, Agencia de Cambios, Unipessoal LDA

As part of complying with the European General Data Protection Regulation (GDPR) Small World publishes this Privacy Notice which details how, why and for how long personal information is collected and handled in the European Economic Area.

### **How Small World collect your information**

Small World collects personal information about you from a variety of sources including but not limited to those below. You agree to the processing of this information for the purposes and ways described in this privacy notice including the transfer of your personal information outside of the European Economic Area.

Small World will only collect and process personal data about you where we have lawful bases. Lawful bases include consent (where you have given consent), contract (where processing is necessary for the performance of a contract with you (e.g. to deliver the Small World Services you have requested) and "legitimate interests".

Where we rely on your consent to process personal data, you have the right to withdraw or decline your consent at any time and where we rely on legitimate interests, you have the right to object.

We collect personal information you supply when: (a) you ask us or one of our affiliated companies, Small World agents ("Agents") to send or receive money sign up to or use any of our other products or services; (b) you submit personal information on applications or other forms to us or our Agents; or (c) you otherwise submit personal information to us, our Agents or others;



We collect and generate personal information about you and your transactions with us or our Agents;

We collect personal information about you from a variety of third party sources such as our business customers, government agencies and consumer and credit reporting agencies and other suppliers of information to assist us in providing you with the products or services requested or to assist us in running our business.

We collect personal information when we are required to do so by law and as part of compliance programmes, in particular those related to anti-money laundering and preventing criminal and fraudulent activity;

We collect personal information about the domain and host from which you access the Internet, your computer's IP address, browser and operating system software, the date and time you access our website and the address of the site from which you linked to our website when you visit us;

We may collect and retain your bank, payment card and other payment details when you use our services and for use in future transactions and services; and

We collect personal information on your online activity as described in the paragraph below titled "COOKIES AND INTERNET TECHNOLOGY."

The personal information we collect includes, but is not limited to, name, address, and telephone number, information about the form of identification used to send or receive a transaction (where we are required by law) including the identification and a copy of the identification document, transaction activity, bank account and payment information, the products and services you have with us and your use of them, and your computer's IP address and other online activity details.

If you have any questions about the lawful bases upon which we collect and how we use your personal data, please contact our Data Protection Officer (DPO@smallworldfs.com).

### **Why Small World collects your information**

We use the personal information we obtain about our customers for the following activities

To provide, deliver and assist us in providing, managing and delivering any products and services to you (including money transfers, payment services and other Small World products or services) and to help us improve and develop these services;

To send you and keep you informed about commercial communications, subject to any choices you have made, about Small World or third party's products and services or other updates;

To verify any of the information you provide in order to effect, administer and enforce transactions, to manage our customer relationships, to confirm your eligibility for any service you apply for, and to maintain accuracy of our records;



To comply with legal and regulatory obligations including those aimed at preventing money laundering and related criminal or suspected criminal activity;

If you apply to become a Small World Agent, we will use the personal information you provide to consider your application and verify your suitability and eligibility to be an agent;

To allow you to receive the best experience using this website including to store your preferences, passwords and other information and track activity on our website; to better understand the effectiveness of our promotional campaigns; to determine whether you came to our site from a banner ad or an affiliate website; to deliver information specific to your interests on additional websites, to determine whether you've acted on our promotional messages; and

We will also use personal information about you to improve the running of this site and to improve customer experience and the operation of our business.

By providing your home telephone number, home address, email address and/or mobile telephone you expressly consent to Small World contacting you from time to time by telephone, post, e-mail or SMS/MMS messaging and targeted or personalized messaging (e.g. on social media and other digital channels) with news, offers, services and promotions concerning Small World Services. You understand and agree that any charges imposed by the provider of such services are your sole responsibility. You can withdraw your consent at any time.

#### **Information Small World disclose**

We may disclose personal information to the following Small World group companies including, but not limited to,

LCC Trans-Sending Ltd (including branches incorporated in Ireland, Germany, Netherlands & Italy)

LCC Trans-Envio SPRL

Choice Money Transfer Inc

Small World Financial Services (Canada) Limited

Swiss Transfers GmbH

Small World FS, Africa SA

Small World FS, Ireland Ltd

Small World FS Norway AS

Small World FS, Spain SAU

Small World FS, Sweden AB

SW Brasil Services Financeiros e Turismo Ltda



Small World Exchange Services, SLU

Small World Financial Services Spain SA

Trans-Envio, Agencia de Cambios, Unipessoal LDA

Companies which help us run or improve the running of our business or which help us deliver products and services to you;

In order comply with legal, regulatory, security and processing requirements, government and foreign government requirements applicable to us, our Affiliates or service providers, including, but not limited to, anti-money laundering laws;

To organisations which help us process transactions, validate customer information, and help us prevent debt, fraud, theft or loss;

As permitted or required by any applicable laws and regulations

Small World and our affiliates worldwide may disclose your personal information, including, but not limited to, your name, customer ID number, address, transaction patterns and bank account information, (i) if we are required to do so by domestic or foreign law or legal process or (ii) to law enforcement authorities or other government officials (including those in this country, the United States or elsewhere) for purposes such as detecting, investigating, prosecuting and preventing crimes, including money laundering and related criminal activity, and the recipients may further disclose the personal information for these and other related purposes.

### **How long SMALL WORLD will keep your information**

We will keep your personal data for as long as we have a relationship with you. Once our relationship with you has come to an end (e.g. following a transaction), or you decide to cancel and not to go ahead with a transaction, we will only retain your personal data for a period of time that is calculated depending on the type of personal data, and the purposes for which we hold that information.

We will only retain information that enables us to:

- Maintain business records for analysis and/or audit purposes;
- Comply with record retention requirements under the law (for example, as required under legislation concerning the prevention, detection and investigation of money laundering and terrorist financing);
- Defend or bring any existing or potential legal claims;
- Maintain records of anyone who does not want to receive marketing from us;
- Deal with any future complaints regarding the services we have delivered;
- Assist with fraud monitoring; or
- Assess the effectiveness of marketing that we may have sent you.

The retention period is often linked to the amount of time available to bring a legal claim, which in many cases is six or seven years following a transaction. We will retain your personal data after this time if we are required to do so to comply with the law, if there are outstanding claims or complaints that will reasonably require your personal data to be retained, or for regulatory or technical reasons.

If we do, we will continue to make sure your privacy is protected.

## **Your rights**

### **The right to access information we hold on you**

At any point you can contact us to request the information we hold on you as well as why we have that information, who has access to the information and where we got the information.

Once we have received your request we will respond within 30 days. There are no fees or charges for the first request but additional request for the same data may subject to an administrative fee of £25 per request. In order to process your request SMALL WORLD may need to verify you identify for your security in such cases your response will be necessary for you to exercise this right.

### **The right to correct and update the information we hold on you**

If the data we hold on you is out of data incomplete or incorrect, you can inform SMALL WORLD and it be shall be updated. In order to process your request SMALL WORLD may need to verify you identify for your security in such cases your response will be necessary for you to exercise this right.

### **The right to have your information erased**

If you feel that we should no longer be using your data or that we are illegal using your data, you can request that we erase the data we hold. When receive your request will confirm whether the data has been deleted or the reason why it cannot be deleted. In order to process your request SMALL WORLD may need to verify you identify for your security in such cases your response will be necessary for you to exercise this right.

### **The right to object to processing of your data**

You have to right to request that SMALL WORLD stop processing your data.

Upon receiving the request will contact you if we are able to comply or if we have legitimate grounds to continue.

If data is no longer processed SMALL WORLD may continue to hold your data to comply with your other rights. In order to process your request SMALL WORLD may need to verify you identify for your security in such cases your response will be necessary for you to exercise this right.

### **The right to data portability**



You have the right to request that we transfer your data to another controller. Once SMALL WORLD receives your request to will comply where it is feasible. In order to process your request SMALL WORLD may need to verify you identify for your security in such cases your response will be necessary for you to exercise this right.

### **Consent**

In such cases that we need your consent to hold your information SMALL WORLD will ask you to check a box on any form requiring consent by checking these boxes you are stating that you are informed of why SMALL WORLD is collecting the information, how they will use it, how long they keep it for, who else will have access to it and what your rights are as a data subject.

### **Sharing your information**

Where necessary to fulfil our obligations to you SMALL WORLD may pass your details to third parties, these third parties include SWFS Group affiliated entities, correspondent banks and non-banks processing payments to beneficiaries located in or outside the European Economic Area.

### **COOKIES & INTERNET TECHNOLOGY**

We use internet technologies like cookies for a variety of purposes, including, but not limited to, those identified below.

To assist us in providing services to you;

To allow you to change webpages during your visit without having to re-enter your password;

To temporarily track activity on our website;

To determine whether you came to our site from a banner ad or an Affiliate website;

To deliver information specific to your interests on additional websites; or

To identify you when you visit the website, to personalize the content of the website for you and to assist you in carrying out transactions and accessing account information.

Small World has implemented the capability for the user to manage cookies on our websites. We will only read or write cookies based on your preference level, (note: cookies set prior to you changing your preference level are maintained on your computer, to remove them please refer to your browser settings). If your browser does not support JavaScript you can find out about the cookies used on our sites and can only manage the use of cookies through your web browser settings. Please note that if you disable all cookies on your browser, this will limit the features of this site and may impact the ability to complete your transaction.

For more information on how Small World uses cookies please go to <https://www.smallworldfs.com/small-world/esp/en-gb/cookies-policy>

## **COMPLAINTS**

Should you not be satisfied with our services you may make a complaint in writing to us at the contact details published on our terms and conditions. We will try Our best to deal with Your complaint at the first opportunity and We will send You a final response letter within 15 business days of receipt of Your complaint. In exceptional circumstances, we will send You a holding reply within 15 business days specifying the deadline by which You will receive Our final response, being no later than 2 months days from the date of Your initial complaint. If you do not receive our final response or You are unhappy with our final response, you may refer it directly, in the European Union, to our lead supervisory authority the “Information Commissioner’s Office” (<https://ico.org.uk/concerns/>). You also have the possibility to enforce Your rights before the competent courts of general jurisdiction. Alternatively, you may use the Online Dispute Resolution (“ODR”) process. The ODR offers an out-of-court solution to disputes connected to online transactions: <http://ec.europa.eu/consumers/odr/>.

In case you want to lodge a complaint thru your local Data Protection Authority, please, check the following link to access European Data Protection Authorities contact;[http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\\_en.htm](http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm)

### **Contact details**

If have any queries about this notice, need further information or wish to lodge a complaint you can use the details below to contact the relevant party.

### **Group Data Protection Officer/Data Compliance Contact**

Mariano Ciriotti

[DPO@smallwordfs.com](mailto:DPO@smallwordfs.com)

Paseo del Club Deportivo 1, Edificio 13  
Pozuelo de Alarcón, Madrid – Spain (28223)

### **Data Controller**

Small World Financial Services Group Ltd.

[DPO@smallwordfs.com](mailto:DPO@smallwordfs.com)

Address:

Parliament House, 12 Salamanca Place  
London, SE1 7 HB  
United Kingdom